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*Attorneys for Third Party Defendants,
Legacy Insurance Group and Mike Payne*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SAFECO INSURANCE COMPANY OF
AMERICA, a foreign corporation,

Plaintiff,

vs.

RIP VAN 899, LLC a Nevada limited liability
company,

Defendant.

RIP VAN 899, LLC, a Nevada limited liability
company,

Counterclaimant,

vs.

SAFECO INSURANCE COMPANY OF
AMERICA, a foreign corporation,

Counterdefendant.

RIP VAN 899, LLC, a Nevada limited liability
company,

Third Party Plaintiff,

vs.

MIKE PAYNE, an individual; LEGACY
INSURANCE GROUP, a Nevada Domestic
Corporation

Third Party Defendants.

CASE NO.: 2:23-cv-01417-ART-NJK

**STIPULATION AND ORDER
EXTENDING TIME FOR RESPONSE TO
THIRD-PARTY COMPLAINT**

1 IT IS HEREBY STIPULATED between Third-Party Plaintiff, RIP VAN 899, LLC, by and
 2 through its counsel of record, Michael M. Lin, Esq., of the LIN LAW GROUP, and Third-Party
 3 Defendants, LEGACY INSURANCE GROUP and MIKE PAYNE (hereinafter, collectively the
 4 “Third-Party Defendants”), by and through their respective attorney, Marc S. Cwik, Esq. of LEWIS
 5 BRISBOIS BISGAARD & SMITH LLP, pursuant to LR 6-1, 6-2 and 7-1, that the time to respond
 6 to the Third-Party Complaint on file herein is hereby extended to and including February 28, 2024.
 7 The agreed-to extension is in good faith and stipulated between the aforementioned parties for the
 8 following reasons:

9 (1) defense counsel has only recently been retained; Defendant MIKE PAYNE has
 10 been unavailable prior to February 5, 2024 for consultation due to a personal illness;
 11 and additional time is needed for defense counsel to consult with his clients;

12 (2) the Third-Party Defendants were not served on the same date [*see* ECF Nos. 24
 13 and 25] making their current response dates falling on different days and in the
 14 interests of judicial economy, it is sensical to have them respond on the same date,
 15 due to their alleged interrelationship; and

16 (3) defense counsel was out of town January 31, 2024 through February 4, 2024 and
 17 has commitments in other cases this week requiring immediate attention.

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1 IT IS HEREBY FURTHER STIPULATED between the Parties that they do not waive any
2 claims, objections, or defenses of any kind by entry of this Stipulation, and this Stipulation does not
3 operate as an admission against interest by any Party.

4 DATED this 6th day of February, 2024.

5 LEWIS BRISBOIS BISGAARD & SMITH LLP

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7 By /s/ Marc S. Cwik
8 MARC S. CWIK
9 Nevada Bar No. 6946
6385 S. Rainbow Boulevard, Suite 600
10 Las Vegas, Nevada 89118
Attorneys for Third Party Defendants
Legacy Insurance Group and Mike Payne

11 DATED this 6th day of February, 2024.

12 LIN LAW GROUP

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14 By /s/ Michael M. Lin
15 MICHAEL M. LIN, ESQ.
16 Nevada Bar No. 10392
5288 Spring Mountain Road, Ste. 103
17 Las Vegas, Nevada 89146
Attorneys for Third Party Plaintiff
RIP VAN 899, LLC

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19
20 **ORDER**

21 IT IS SO ORDERED.

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UNITED STATES MAGISTRATE JUDGE

24 Dated: February 6, 2024